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Counsel for Debtors and Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

In re:)
)
EASY STREET HOLDING, LLC, et. al.	Bankruptcy Case No. 09-29905
Deletere) Jointly Administered with Cases
Debtors) 09-29907 and 09-29908
Address: 201 Heber Avenue) Chapter 11
Park City, UT 84060)
• /) Honorable R. Kimball Mosier
Tax ID Numbers:)
35-2183713 (Easy Street Holding, LLC),)
20-4502979 (Easy Street Partners, LLC), and)
84-1685764 (Easy Street Mezzanine, LLC))

EX PARTE MOTION FOR CROWELL & MORING TO APPEAR TELEPHONICALLY AT HEARING ON FEE APPLICATIONS

Easy Street Partners, LLC ("Partners"), Easy Street Mezzanine, LLC, and Easy Street Holding, LLC (together, the "Debtors") hereby submit their <u>ex parte</u> motion (the "<u>Ex Parte</u> Motion") for leave to have their co-counsel, Crowell & Moring, appear at the hearing on

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professional fee applications, including Crowell & Moring's, scheduled for March 16, 2010, by telephone rather than incur the expense and time to travel to Utah for the hearing. In support of this Ex Parte Motion, the Debtors state as follows:

- 1. Hearing on interim fee applications (together, the "Interim Fee Applications") of Crowell & Moring and Durham Jones & Pinegar, co-counsel for the Debtor, of Wrona & Associates and Corbin Gordon, special counsel for the Debtors, of Appraisal Group, Inc., expert appraisers for the Debtors, and of Jones Waldo Holbrook & McDonough, counsel for the Official Committee of Unsecured Creditors (the "Committee"), is scheduled for March 16, 2010.
- 2. One response has been filed to some or all of the Fee Applications, by WestLB, AG ("WestLB"), the major secured creditor in the Partners case, and one objection has been filed to several of the law firms' Fee Applications, by the Committee. WestLB has essentially reserved its right to object to fees later and the Committee has expressed some limited concerns, principally about certain services by Crowell & Moring, which should be resolved prior to the hearing. The Debtors do not anticipate that evidence will be presented at the hearing on the Interim Fee Applications.
- 3. Counsel for both WestLB and for the Committee do not object to Crowell & Moring appearing by telephone at the hearing on the Interim Fee Applications and all agree that it is sensible to avoid the expense of travel to Salt Lake City for the hearing in light of the responses that have been filed.
- 4. Durham Jones & Pinegar, co-counsel for the Debtors will appear at the hearing in person.

WHEREFORE, the Debtors requests that the Court authorize Crowell & Moring to appear at the hearing on the Interim Fee Applications by telephone.

DATED this 12th day of March, 2010

DURHAM JONES & PINEGAR, P.C.

By: /s/ Kenneth L. Cannon II

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